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11 United States District Court  
12 Northern District of California, San Jose Division

13 VERIGY U.S. INC., a Delaware corporation

14 Plaintiff,

15 vs.

16 ROMI OMAR MAYDER, an individual;  
17 WESLEY MAYDER, an individual;  
18 SILICON TEST SYSTEMS INC., a  
California corporation; SILICON TEST  
19 SOLUTIONS LLC, a California limited  
liability corporation,

20 Defendants.  
21

) Case No. 5:07-cv-04330 (RMW) (HRL)

) **Defendants' Administrative Motion For Leave**  
) **To File Documents Under Seal**

) Judge: Hon. Howard R. Lloyd

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1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Defendants request that portions of the  
2 document entitled *Defendants Reply Brief to Verigy's Opposition to Defendants Motion to Compel*  
3 *Amended Responses and Production of Responsive Documents* be filed under seal because they  
4 contain information that has been designated as confidential or highly confidential under the  
5 Stipulated Protective Order entered by this court on August 29, 2007.

6 These documents contain information that has been designated "Confidential" or "Highly  
7 Confidential — Attorneys' Eyes Only" by one or more parties under the Stipulated Protective Order.  
8 Although Defendants reserve the right to challenge the designation of certain material by Verigy,  
9 information in these materials has been designated as protected from disclosure under the Stipulated  
10 Protective Order at the present time. Defendants rely on that information in support of its motion to  
11 compel production of responsive documents. The parties' confidentiality interest therefore  
12 overcomes the right of public access to the record, as a substantial probability exists that the parties'  
13 overriding confidentiality interests will be prejudiced if the record is not sealed. Further, the  
14 proposed sealing is narrowly tailored, and no less-restrictive means exist to achieve the parties'  
15 overriding interests.

16 The Defendants therefore lodge the above-identified materials with this court pursuant to  
17 Civil Local Rule 79-5(b) and 79-5(c) and request leave to file the aforementioned documents under  
18 seal.

19 Dated: May 27, 2008

Mount & Stoelker, P.C.

Kevin M. Pasquinelli

/s/

Attorneys for Defendants Romi Mayder,  
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